

**REMARKS/ARGUMENTS**

**Overview of the Office Action**

Claims 1 and 17 were rejected under 35 U.S.C. § 102(b) as being anticipated by Juster (U.S. Patent No. 5,724,406).

Claims 1, 2, 8-15, 17, 18, and 20-24 were rejected under 35 U.S.C. § 102(b) as being anticipated by Satter et al. (U.S. Patent No. 5,243,643).

Claims 3-5 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Satter in view of Matthews et al. (U.S. Patent No. 4,652,700).

Claims 6 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Satter in view of Matthews and further in view of Weber (U.S. Patent No. 6,094,239).

Claims 16 and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Satter in view of Chencinski et al. (U.S. Patent No. 5,355,406).

**Status of the Claims/Amendments**

Claims 1-25 are pending.

**Claims Rejected Under 35 U.S.C. § 102(b)**

**Regarding Claims 1 and 17**

Claims 1 and 17 were rejected under 35 U.S.C. § 102(b) as being anticipated by Juster (U.S. Patent No. 5,724,406).

In regard to Claim 1, the Examiner concludes that "Juster teaches using various call processing primitives (CPP) for customizing call process service (column 5, lines 12-32)" and that "Juster's software [module] includes functions of call flows (column 5, lines 26-29), codes (a software comprises computer executable codes), and a list of names (names of variables, functions, users, etc.) and a modifiable list of corresponding DTMF signal

identifier (column 5, lines 23-26).” The Examiner also reaches a similar conclusion in regard to Claim 17.

However, the Applicants respectfully submit that Juster does not teach or suggest “a table with a list of names and a modifiable list of corresponding DTMF signal identifiers” as set forth in Claims 1 and 17. This modifiable list of corresponding DTMF signal identifiers, referred to in the specification as a “Customization List,” comprises “a table with a list of names recognized by the development system and a modifiable list of corresponding DTMF signals identifiers” that enable a user to “change the mapping between caller-entered DTMF signal and the corresponding actions taken by the messaging system by modifying the list of DTMF signal identifiers in the Customization List(s)” (Specification, page 14, lines 24-29). Thus, in the invention of the present application, the DTMF signal identifiers are mapped to specific modules, each of which performs specific desired functions, and remapping DTMF signals to the modules requires nothing more than modifying this table (the Customization List).

The invention of Juster, on the other hand, comprises a plurality of modules (referred to as “CPPs”) that “perform one single identifiable operation, such as recording a message, playing a prompt, collecting a digit, *reading DTMF sequences*, etc.” (col. 5, lines 27-29) (emphasis added). Moreover, for example, “a user develops a voice mail messaging application having the necessary voice prompts and DTMF responses *by selecting appropriate CPPs [modules] that generate those prompts and tone responses*” (col. 5, lines 23-26) (emphasis added). In other words, each CPP in the invention of Juster has hard-coded DTMF signal identifiers, and thus it would be necessary to select an alternate CPP having the same functionality but different DTMF signals when a user desires to change which DTMF signals initiate the desired CPP functionality. Therefore, in order to achieve the same level of

flexibility afforded by a single module with DTMF signal mapping in a Customization List as disclosed in the present application, the invention of Juster would necessarily require a library of CPPs, one for each possible combination and/or permutation of possible DTMF signal identifiers that a user may find desirable to use to call the specific functionality.

Nowhere does Juster suggest that a user can actually modify a single CPP such that specific DTMF signals corresponding to specific functionality for that specific CPP are thereby changed. On the contrary, Juster instead teaches away from a DTMF-modifiable CPP and instead suggests that a user must select a specific (or "appropriate") CPP to achieve specific functionality, including hard-coded DTMF mapping, which is predefined for each individual CPP. Consequently, the inability of a user to change the specific DTMF signals corresponding to specific functionality for a specific CPP in the invention of Juster requires a programmer must to first develop, for utilization by a user, a library of CPPs for each possible combination of DTMF signals mapped to specific CPP functionality from which the user can select the DTMF mapping desired. The only other alternative is custom development of CPPs on an as-needed basis where "such diverse requirements are handled by modifying the application code as required for each different incarnation...[t]his solution, however, is unsatisfactory since it creates a complex maintenance dilemma...[t]he changes may be simple in nature but the maintenance of a set of changes to the standard product for every customer can nonetheless become unduly burdensome and expensive" (Specification, page 4, lines 13-21).

In contrast, Claim 1 of the present invention claims "a module comprising call flows, code and a customization list; wherein the customization list comprises a table with a list of names and a modifiable list of corresponding DTMF signal identifiers, whereby *the particular customer is permitted to change the mapping between caller-entered DTMF*

*signals and the corresponding actions taken by the messaging system by modifying the list of DTMF signal identifiers*" (emphasis added). For example, the user might have favorite numbers or combinations of numbers pertaining to specific functionality (for example, pressing "\*6" to delete a voicemail message), or that the conversion from letters to numbers on the telephone keypad could provide for mnemonic enhancement for the user's benefit (for example, pressing "335"—the numbers corresponding to the letters "DEL"—to delete a voicemail message). The benefits afforded by the present invention are not available via the invention of Juster.

This specific limitation, which enables a user to modify the specific DTMF signals corresponding to specific functionality for that specific module, precludes the need for a library of modules with various DTMF signal mapping, and thereby clearly differentiates the present invention from the invention of Juster. Moreover, Claim 17 includes a similar limitation, and is likewise distinguishable from the teachings of Juster. Therefore, Applicants respectfully request that this rejection under § 102(b) be withdrawn and that Claims 1 and 17 be allowed to issue.

**Regarding Claims 1, 2, 8-15, 17, 18, and 20-24**

Claims 1, 2, 8-15, 17, 18, and 20-24 were rejected under 35 U.S.C. § 102(b) as being anticipated by Satter et al. (U.S. Patent No. 5,243,643).

In regard to Claim 1, the Examiner concludes that "Satter discloses a voice processing system with configurable caller interfaces, comprising: a module [caller interface] comprising call flow functions, code and customization list (column 28, lines 18-37); wherein the customization list comprises a table of names and modifiable list of corresponding DTMF signal identifiers, where a customer is permitted to change the mapping between caller entered DTMF signal, and the corresponding actions taken by a voice messaging system

(column 28, lines 1-3, 18-51; column 29-30, Vector Pogrecln)." The Examiner also reaches a similar conclusion in regard to Claim 17.

However, the Applicants respectfully submit that Sattar does not teach or suggest "a table with a list of names and a modifiable list of corresponding DTMF signal identifiers" as set forth in Claims 1 and 17. This modifiable list of corresponding DTMF signal identifiers, referred to in the specification as a "Customization List," comprises "a table with a list of names recognized by the development system and a modifiable list of corresponding DTMF signals identifiers" that enable a user to "change the mapping between caller-entered DTMF signal and the corresponding actions taken by the messaging system by modifying the list of DTMF signal identifiers in the Customization List(s)" (Specification, page 14, lines 24-29). Thus, in the invention of the present application, the DTMF signal identifiers are mapped to specific modules, each of which performs specific desired functions, and remapping DTMF signals to the modules requires nothing more than modifying this table (the Customization List).

The invention of Sattar, on the other hand, takes an entirely different approach where the DTMF signal mapping is stored in compiled software that can only be changed by an application developer. Specifically, DTMF signal mapping is stored in the software listing of Appendix A of Sattar (see col. 28, lines 18-24). Appendix A is (a) a listing of vectors (Sattar's equivalent to modules of the present application) used to control caller interfaces to the voicemail system (see col. 28, lines 6-10). Vectors are stored in an Application State Logic Table (AST) which is compiled rather than used in source code form (see col. 11, line 66 through col. 12, line 10) and that are generated by an application editor (APE) (see col. 14, lines 67 through col. 15, line 19). Significantly, vectors are only modifiable and adaptable in the C-language (col. 11, lines 42-49; col. 12, lines 21-26), and thus changing vectors requires

recompilation. More specifically, to change DTMF signals, a “user”—which is actually an application developer (see col. 28, lines 1-6)—edits the vectors using APE (col. 28, lines 16-24) which, again, is an editor for source code that must be compiled for use.

Nowhere does Sattar suggest that a non-programmer user can actually modify (aside from rewriting the C-language code and recompiling) a single vector such that specific DTMF signals corresponding to specific functionality for that specific vector are thereby changed. On the contrary, Sattar instead teaches away from a DTMF-modifiable vector and speaks only to an application developer hard-coding DTMF mapping in the C-programming language for compilation (thus resulting in a predefined vector from the end-user perspective). Consequently, the inability of a user to change the specific DTMF signals corresponding to specific functionality for a specific vector in the invention of Sattar requires a programmer to first develop, for utilization by an end-user, a library of vectors for each possible combination of DTMF signals mapped to specific vector functionality from which, presumably, the user can select the DTMF mapping desired. The only other alternative is custom development of vectors on an as-needed basis where “such diverse requirements are handled by modifying the application code as required for each different incarnation...[t]his solution, however, is unsatisfactory since it creates a complex maintenance dilemma...[t]he changes may be simple in nature but the maintenance of a set of changes to the standard product for every customer can nonetheless become unduly burdensome and expensive” (Specification, page 4, lines 13-21).

In contrast, Claim 1 of the present invention claims “a module comprising call flows, code and a customization list; wherein the customization list comprises a table with a list of names and a modifiable list of corresponding DTMF signal identifiers, whereby *the particular customer is permitted to change the mapping between caller-entered DTMF*

*signals and the corresponding actions taken by the messaging system by modifying the list of DTMF signal identifiers*” (emphasis added). To recite the sample example previously used herein, the user might have favorite numbers or combinations of numbers pertaining to specific functionality (for example, pressing “\*6” to delete a voicemail message), or that the conversion from letters to numbers on the telephone keypad could provide for mnemonic enhancement for the user's benefit (for example, pressing “335”—the numbers corresponding to the letters “DEL”—to delete a voicemail message). The benefits afforded by the present invention are not available via the invention of Sattar.

This specific limitation, which enables a user to modify the specific DTMF signals corresponding to specific functionality for that specific module, precludes the need for a library of modules with various DTMF signal mapping, and thereby clearly differentiates the present invention from the invention of Sattar. Moreover, Claim 17 includes a similar limitation, and is likewise distinguishable from the teachings of Sattar.

For these reasons, Applicants respectfully request that, in regard to Claims 1 and 17, the rejection under § 102(b) be withdrawn. Moreover, given that Claims 2, 8-15, 18, and 20-24 are claims that depend from Claim 1 or Claim 17, Applicants further request that the rejection under § 102(b) be withdrawn. Finally, in light of the traversal of the forgoing rejection, Applicants humbly submit that Claims 1, 2, 8-15, 17, 18, and 20-24 should be allowed to issue.

**Claims Rejected Under 35 U.S.C. § 103(a)**

Claims 3-7, 16, 19, and 25 have been rejected as follows: Claims 3-5 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Satter in view of Matthews et al. (U.S. Patent No. 4,652,700); Claims 6 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Satter in view of Matthews and further in view of Weber (U.S.

Patent No. 6,094,239); and Claims 16 and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Satter in view of Chencinski et al. (U.S. Patent No. 5,355,406). However, Claims 3-7, 16, 19, and 25 depend from independent Claim 1 or Claim 17 and, as such, are allowable as dependent claims depending from an allowable claim. Therefore, Applicants respectfully request that the rejections against these claims under 35 U.S.C. § 103(a) be withdrawn and that these claims be allowed to issue.

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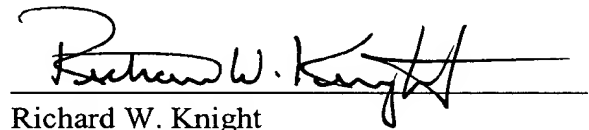
**CONCLUSION**

Based on the reasons and rationale set forth herein, Applicants respectfully submit that the objections and rejections have been overcome and, accordingly, Applicants request that the objections and rejections be withdrawn and that the claims be allowed to issue.

Should the Examiner have any questions, comments, or suggestions that would expedite the prosecution of the present case to allowance, Applicants' undersigned representative earnestly requests a telephone conference at (206) 332-1394.

Respectfully submitted,

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